

**U.S. EPA/Weston Comments on Landfill Cover Repair Workplan  
August 18, 2009**

**1. General Comment**

Does the current HASP include cover repair task? If the HASP does not have a cover repair task, it should be revised to include the cover repair task.

**2. General Comment**

A topographic survey depicting surface water drainage should be conducted after the leachate collection system winterization and repairs to the cover have been completed.

**3. 2.1 Cover thickness**

The area where the cover thickness is less than 2-feet, the cover in that area does not meet the requirement set forth for cover thickness by IAC 807 rule.

**4. 3.3 Construction Documentation Report**

The cover repair plan does not include construction quality assurance and quality control. Include construction quality assurance and quality control in the plan.

**5. 3.1.1 Identification of Areas to be Filled and Soil Volume Required**

Although general areas for fill are indicated, no final grading plan for the pond area or any other areas is provided as would be expected for this type of work. How are the fill levels to be communicated to the contractors performing the fill activities?

**6. 3.1.3 Pond Water Discharge and Appendix C**

The analysis states that the site meets criteria for the General NPDES Permit, however; the criteria for the permit are not presented nor a comparison made between the lab data and the permit criteria. The criteria for the General NPDES permit should be presented in the analysis.

**7. 3.1.5 Soil Borrow Source**

No soil testing is proposed for the borrow material. At a minimum, TCLP should be performed on the borrow material.

**8. 3.2.6 Winterization of Existing Leachate Recovery System**

Provide how the waste material removed during trenching will be handled and disposed off.

**9. 3.2.6 Winterization of Existing Leachate Recovery System**

There is no compaction requirement for the backfill in the trench. The backfill should be compacted to ensure no ponding of water.